

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

2007 MAR - 5 PM A 9:26

ANTHONY RICHARDS, SR.

Plaintiff

v.

COFFEE County Sheriff
Department, et al.,
Defendants.

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Case NO.

1:07-CV-261-WKW

Motion for Leave to Amend

Now comes the Plaintiff Anthony Richards, SR. in PRO-SE and moves the Honorable court to grant him permission for leave to amend his complaint that was filed on 3/28/2007

Done this 2nd day of April 2007

Respectfully Submitted

Anthony Richards, Sr.
Plaintiff

Notarization

Sworn to and Subscribed before me this
the _____ day of _____ 2007

P.S. The Jailer refused to Notarize this Motion!
his name is Stanley Roberts

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of same Motion and Amendment upon the Defendants, SUTTON, MOSS, and Gibson of the Coffee County Sheriff Department, NEW BROCKTON, Alabama. 36351, by placing the same in United States Mail postage prepaid this 2nd day of April 2007

Anthony Richards, Jr.
plaintiff

9 Anthony Richards, SR.
Coffee County Jail
County Complex #4
New Brockton, AL 36351
Filed 04/05

MONTGOMERY ET AL 361

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Office of the Clerk
United States District Court
P.O. Box 711
Montgomery, Alabama 36101-0711

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Legal Mail

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Plaintiff

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Amendment to Complaint

To this Honorable Court, the plaintiff feels that Ground ONE of his original complaint speaks for itself. The Plaintiff was indeed injured in a head on collision Auto Accident on 3-9-07 while being transported to work at the Coffee County landfill by Corrections officer Dallas Gibson. The plaintiff is a pre-trial detainee, at the Coffee County jail. Since the Auto Accident the plaintiff no longer works at the County landfill or any other job assignment, due to the injuries that he sustained in the Auto Accident. Corrections officer Dallas Gibson no longer uses that dangerous dirt road in which the accident occurred to transport the inmates to the landfill. It is the opinion of the plaintiff and a co-worker of officer Gibson's who works at the landfill that officer Gibson should have never used that dirt road to transport inmates to the work site. The change of procedure proves that MR. Gibson must also think the road is dangerous.

Futhermore, the plaintiff has constantly complained since the Accident about neck and back pains. While the plaintiff has had an X-Ray done on his right wrist and an X-RAY and a cat Scan done on his right knee, the plaintiff's request for a Back specialist to do an MRI on his Back and diagnoses his neck pains, have not been met. ON 4-2-07 The plaintiff was taken back to see DR. Meloni. The plaintiff requested to see a Back specialist. DR. Meloni stated "verbatim" You don't need to find out what injuries you sustained in the Accident, you just need to do some work outs to make your neck and Back feel better. The Doctor then ordered for me to go to physical Therapy at Elba General Hospital. That is not normal procedure. My Back and neck pains should be diagnosed before Rehab should be started, or ordered by the Doctor.

Pertaining to Ground Two: The plaintiff did not actually see a Jailer cross out his returned Legal Mail but when his asked the Jailer named MARCIE why the letter was returned, She got very indignant and nasty in saying that who ever you wrote, don't want anything to do with you. that's no way to answer anyone. Futhermore on 4-2-07, I received a letter from the United States district Court. It was a Recommendation from Her Honor Judge Susan Russ Walker.

Upon receiving my mail I noticed that it was already openend outside of the presence of the plaintiff. When I got the letter from officer Allen Baxley I asked him why my Legal mail was openend. He stated that he did not know and that HE got the Legal letter from Captain Richard Moss the Administrator of the Jail and one of the three named Defendants in this complaint. It is the Law and the procedure of any Jail or penal institution that any and all Legal Mail be open in the presence of an inmate. The plaintiff feels that his letter from Judge Susan Russ Walker was opened, Read and therefore Tampered with without his Knowledge or permission Furthermore the plaintiff again Respectfully Request from the Court to Appoint him Counsel to Assist him with this claim. Plaintiff has made several Request to go to the Jails law library so he can look up case laws and he has not had access to it.

Done this 2nd day of April 2007

Respectfully Submitted
Anthony Richards, Jr.
Plaintiff in pro-se